

# **EXHIBIT E**

**From:** [Jeffrey L. Haberman](#)  
**To:** [Danninger, Timothy](#); [Jonathan R. Gdanski](#)  
**Cc:** [Folio, Ryan M.](#); [Luk, Arthur](#); [Jonathan R. Gdanski](#); [Kouba, David E.](#); [Massaro, John](#); [Guzman, Michael J.](#); [Schwarz, David L.](#); [LeMieux, George](#); [Wilson, Gabrielle](#); [\\*Eugene@boersch-illovsky.com](mailto:*Eugene@boersch-illovsky.com); [Christopher J. Esbrook](#); [Robert Scher](#); [ccorrell@kslaw.com](mailto:ccorrell@kslaw.com); [David Pustilnik](#); [\\*jkramer@orrick.com](mailto:*jkramer@orrick.com); [Seaton, Lauren](#); [Langner, Bailey](#); [agivens@kslaw.com](mailto:agivens@kslaw.com); [Mitchell Malachowski](#); [jsell@tysonmendes.com](mailto:jsell@tysonmendes.com); [doconnor@oconlaw.com](mailto:doconnor@oconlaw.com); [\\*odonnell@wtotrial.com](mailto:*odonnell@wtotrial.com); [\\*Ronk@wtotrial.com](mailto:*Ronk@wtotrial.com); [dgervase@provisionlaw.com](mailto:dgervase@provisionlaw.com)  
**Subject:** Re: JLI - McKnight  
**Date:** Monday, May 13, 2024 4:32:39 PM

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Hi Tim,  
We do not agree with the requests you sent.  
Thanks,  
Jeff



**Jeffrey Haberman**

Attorney

1212 Southeast Third Avenue  
Fort Lauderdale, Florida 33316  
O (954) 467-8800

[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)

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**From:** Danninger, Timothy <TDanninger@gunster.com>  
**Sent:** Monday, May 13, 2024 12:37 PM  
**To:** Jeffrey L. Haberman <JHaberman@schlesingerlaw.com>; Jonathan R. Gdanski <Jonathan@schlesingerlawoffices.com>  
**Cc:** Folio, Ryan M. <rfolio@kellogghansen.com>; Luk, Arthur <Arthur.Luk@arnoldporter.com>; Jonathan R. Gdanski <JGdanski@schlesingerlaw.com>; Kouba, David E. <David.Kouba@arnoldporter.com>; Massaro, John <John.Massaro@arnoldporter.com>; Guzman, Michael J. <mguzman@kellogghansen.com>; Schwarz, David L. <dschwarz@kellogghansen.com>; LeMieux, George <GLEmieux@gunster.com>; Wilson, Gabrielle <GWilson@gunster.com>; \*Eugene@boersch-illovsky.com <Eugene@boersch-illovsky.com>; Christopher J. Esbrook <christopher.esbrook@esbrook.com>; Robert Scher <rscher@foley.com>; ccorrell@kslaw.com <ccorrell@kslaw.com>; David Pustilnik <david.pustilnik@esbrook.com>; \*jkramer@orrick.com <jkramer@orrick.com>; Seaton, Lauren <lseaton@orrick.com>; Langner, Bailey <BLangner@KSLAW.com>; agivens@kslaw.com

<agivens@kslaw.com>; Mitchell Malachowski <mmalachowski@tysonmendes.com>;  
jsell@tysonmendes.com <jsell@tysonmendes.com>; doconnor@oconlaw.com  
<doconnor@oconlaw.com>; \*odonnell@wtotrial.com <odonnell@wtotrial.com>;  
\*Ronk@wtotrial.com <Ronk@wtotrial.com>; dgervase@provisionlaw.com  
<dgervase@provisionlaw.com>

**Subject:** RE: JLI - McKnight

Jeff/Jon:

Attached are the proposed requests to produce. Please let us know if you will consent to this limited discovery in advance of the discovery deposition we have been discussing. You will note that we removed requests for text messages based on your representation of the earlier agreement regarding text messages of plaintiffs and defendants (text messages are not included in the definitions).

If you agree to these requests, or some agreeable modified requests, we will work with you on timing and process for production.

Let us know if you have any questions or would like to discuss.

We plan to include this in our discovery letter if the parties cannot agree. If the parties agree, we will indicate to the court that the parties have met and conferred and agreed on a limited set of requests to produce in advance of the discovery deposition.

Tim

---

**From:** Jeffrey L. Haberman <JHaberman@schlesingerlaw.com>

**Sent:** Monday, May 13, 2024 11:27 AM

**To:** Jonathan R. Gdanski <Jonathan@schlesingerlawoffices.com>; Danninger, Timothy <TDanninger@gunster.com>

**Cc:** Folio, Ryan M. <rfolio@kellogghansen.com>; Luk, Arthur <Arthur.Luk@arnoldporter.com>; Jonathan R. Gdanski <JGdanski@schlesingerlaw.com>; Kouba, David E. <David.Kouba@arnoldporter.com>; Massaro, John <John.Massaro@arnoldporter.com>; Guzman, Michael J. <mguzman@kellogghansen.com>; Schwarz, David L. <dschwarz@kellogghansen.com>; LeMieux, George <GLEMieux@gunster.com>; Wilson, Gabrielle <GWilson@gunster.com>

**Subject:** Re: JLI - McKnight

Tim-

Is the discovery letter supposed to be done jointly, with each side putting in its respective position? Or do we each file our own letter? Please advise. If it's to be joint, we will have our letter to you soon.

Thanks

**Jeffrey Haberman**

Attorney

1212 Southeast Third Avenue



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O (954) 467-8800

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**From:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>  
**Sent:** Friday, May 10, 2024 3:54:50 AM  
**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>  
**Cc:** Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEMieux@gunster.com](mailto:GLEMieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** Re: JLI - McKnight

Please see below for comments and responses.



**Jonathan Gdanski**

Attorney  
1212 Southeast Third Avenue  
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O (954) 467-8800

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On May 10, 2024, at 8:18 AM, Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)> wrote:

Jeff:

We disagree with the unreasonable restrictions you have put on Mr. McKnight's depositions.

First, 5 hours is reasonable for the discovery deposition. It is our first deposition of Mr. McKnight and will be attended by at least 6 distinct defendant parties. We have repeatedly agreed that we will accommodate Mr. McKnight as necessary in order to complete the deposition.

We are not on the same page. So we will have to reflect our respective positions in the letter brief to the judge.

Second, within 7 days is unreasonable for the time between the depositions. As stated, we believe that the preservation deposition should begin no less than 7 days and no more than 14 days after the discovery deposition. This will allow the parties time to receive the transcript from the discovery deposition and to prepare for the preservation deposition.

We are OK with the preservation deposition taking place between seven and 14 days.

Third, it is patently unreasonable for you to refuse to agree that the preservation deposition will not be used until all parties have had the opportunity to question Mr. McKnight within the confines set by the court or by our agreement. Based on Scott's representation to the court, this seems to be a possibility and is a reasonable standard for the parties to agree to.

Our position on this issue is that all sides are reserving all rights. No one has to make a commitment or take a position now. Therefore there should be no part of anybody's position that is patently unreasonable.

Fourth, 7 hours is reasonable for the preservation deposition in light of the number of parties who will question the witness – possibly in lieu of trial testimony. At trial, all parties would be able to cross-examine Mr. McKnight and that will be no different here. Your attempt to limit the deposition to three hours – the same as you question is patently unreasonable.

Fifth, we are still waiting to hear from you regarding limited written discovery to Mr. McKnight in advance of the discovery deposition.

Please let us know specifically what you are thinking about. If you could let us know what that is today, we would appreciate it. Some of it may be objectionable some of it may not.

My understanding is that at least as it relates to text messages and other messaging applications, there was an agreement not to request that information from the founders or investors in exchange for that not being requested from the personal injury plaintiffs.

Please advise as soon as possible if you will agree to the above.

Tim

---

**From:** Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>  
**Sent:** Thursday, May 9, 2024 3:59 PM  
**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>  
**Cc:** Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** Re: JLI - McKnight

Good afternoon,

On behalf of Walker McKnight, we propose the following regarding the preservation of his testimony. Mr. McKnight will be made available for a deposition before his preservation deposition. Defendants shall have up to two hours to examine Mr. McKnight in the initial deposition. Plaintiff's counsel may conduct a re-direct examination as they deem appropriate. After the completion of the initial deposition, Mr. McKnight will be made available for a preservation deposition within seven business days. Plaintiff's counsel shall have up to three hours to conduct a direct examination. Defendants shall have up to three hours to conduct a cross-examination. Re-direct and re-cross may proceed as necessary.

Please let us know if you agree and/or provide us with your position.

Thanks,  
Jeff

<image002.jpg>

**Jeffrey Haberman**

Attorney

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**From:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Sent:** Tuesday, May 7, 2024 10:14 PM

**To:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Luk, Arthur

<[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski

<[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Cc:** Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman

<[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E.

<[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John

<[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J.

<[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>;

LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle

<[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** RE: JLI - McKnight

I will send a zoom.

---

**From:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>

**Sent:** Tuesday, May 7, 2024 10:11 PM

**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Luk, Arthur

<[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski

<[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Cc:** Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman

<[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E.

<[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John

<[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J.

<[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>;

LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle

<[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** RE: JLI - McKnight

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---

Yes. Thank you.

**Ryan M. Folio**

*Associate*

**KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, PLLC**

1615 M Street, NW | Suite 400 | Washington, DC 20036

Tel: (202) 326-7985 | Fax: (202) 326-7999

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**From:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Sent:** Tuesday, May 7, 2024 10:10 PM

**To:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Jonathan R. Gdanski  
<[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Cc:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Jonathan R. Gdanski  
<[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman  
<[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E.  
<[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John  
<[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J.  
<[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>;  
LeMieux, George <[GLEMieux@gunster.com](mailto:GLEMieux@gunster.com)>; Wilson, Gabrielle  
<[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** [EXTERNAL] RE: JLI - McKnight

Ryan – noon works for all of us, does it work for you?

---

**From:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>

**Sent:** Tuesday, May 7, 2024 9:03 PM

**To:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>; Danninger, Timothy  
<[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>

**Cc:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Jonathan R. Gdanski  
<[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman  
<[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E.  
<[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John  
<[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J.  
<[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>;  
LeMieux, George <[GLEMieux@gunster.com](mailto:GLEMieux@gunster.com)>; Wilson, Gabrielle  
<[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** RE: JLI - McKnight



We can as well, thanks.

---

**From:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>  
**Sent:** Tuesday, May 7, 2024 4:30 PM  
**To:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>  
**Cc:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEMieux@gunster.com](mailto:GLEMieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>  
**Subject:** Re: JLI - McKnight

External E-mail

We can make noon eastern work. Tx

<image003.jpg>

**Jonathan Gdanski**

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On May 7, 2024, at 11:21 PM, Danninger, Timothy  
<[TDanninger@gunster.com](mailto:TDanninger@gunster.com)> wrote:

Jon/Jeff:

Are you or someone from your team available any time tomorrow afternoon? I am tied up until noon also.

Tim

---

**From:** Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>

**Sent:** Tuesday, May 7, 2024 3:12 PM

**To:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>; Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>

**Cc:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** RE: JLI - McKnight

Like Ryan, afternoon would be better for us as we have some conflicts tomorrow morning.

---

**From:** Jonathan R. Gdanski <[Jonathan@schlesingerlawoffices.com](mailto:Jonathan@schlesingerlawoffices.com)>

**Sent:** Tuesday, May 7, 2024 2:01 PM

**To:** Folio, Ryan M. <[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)>

**Cc:** Danninger, Timothy <[TDanninger@gunster.com](mailto:TDanninger@gunster.com)>; Jonathan R. Gdanski <[JGdanski@schlesingerlaw.com](mailto:JGdanski@schlesingerlaw.com)>; Jeffrey L. Haberman <[JHaberman@schlesingerlaw.com](mailto:JHaberman@schlesingerlaw.com)>; Kouba, David E. <[David.Kouba@arnoldporter.com](mailto:David.Kouba@arnoldporter.com)>; Massaro, John <[John.Massaro@arnoldporter.com](mailto:John.Massaro@arnoldporter.com)>; Luk, Arthur <[Arthur.Luk@arnoldporter.com](mailto:Arthur.Luk@arnoldporter.com)>; Guzman, Michael J. <[mguzman@kellogghansen.com](mailto:mguzman@kellogghansen.com)>; Schwarz, David L. <[dschwarz@kellogghansen.com](mailto:dschwarz@kellogghansen.com)>; LeMieux, George <[GLEmieux@gunster.com](mailto:GLEmieux@gunster.com)>; Wilson, Gabrielle <[GWilson@gunster.com](mailto:GWilson@gunster.com)>

**Subject:** Re: JLI - McKnight

External E-mail

I can do between 10-12 eastern. Tx

<image001.jpg>

**Jonathan Gdanski**

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On May 7, 2024, at 5:13 PM, Folio, Ryan M.  
<[rfolio@kellogghansen.com](mailto:rfolio@kellogghansen.com)> wrote:

I can be flexible, but afternoon is preferable. Thanks Tim.

**Ryan M. Folio**  
*Associate*  
**KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, PLLC**  
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**Sent:** Monday, May 6, 2024 10:25 PM

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**Subject:** [EXTERNAL] JLI - McKnight

We need to set a time Wednesday for a meet and confer to discuss the McKnight deposition. Please respond to this email with your team's availability – one person per party, please.

Tim

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